

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

**ROOSEVELT ROAD RE, LTD. and  
TRADESMAN PROGRAM MANAGERS, LLC,**

**Plaintiffs,**

**Case 1:24-cv-01549-NG-LB**

**v.**

**SURGICARE OF WESTSIDE, LLC; SIDDHARTHA SHARMA, DPM; SURGICORE 5TH AVENUE LLC a/k/a and b/s/a FIFTH AVENUE SURGERY CENTER, LLC; NY ORTHO, SPORTS MEDICINE & TRAUMA, P.C.; JEFFREY STONE KAPLAN, MD; MATTHEW P. GRIMM, MD; ADRIAN PUJA, RPT; JOSEPH WEINSTEIN, D.O., P.C.; JOSEPH WEINSTEIN, DO; ANDREW MEROLA, MD; KOLB RADIOLOGY P.C.; THOMAS M. KOLB, MD; LENOX HILL RADIOLOGY AND MEDICAL IMAGING ASSOCIATES, P.C.; FOGELGAREN FORMAN & BERGMAN, LLP; ERIC FOGELGAREN; JONATHAN FORMAN; ROBERT BERGMAN; GORAYEB & ASSOCIATES, PC; and CHRISTOPHER J. GORAYEB**

**Defendants.**

---

**NOTICE OF PARTIAL VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P.  
41(a)(1)(A)(i)**

---

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiffs ROOSEVELT ROAD RE, LTD. and TRADESMAN PROGRAM MANAGERS, LLC hereby give notice that this action is voluntarily dismissed only as to Defendants John Hajjar, MD, Surgicare, LLC, Surgicare of Manhattan, LLC, Surgicare, PC, Boro Ventures, LLC, Sovereign Medical Group, LLC, Sovereign Management, LLC, Regent Medical Properties, LLC, Anthony Degradi, Wayne Hatami, Feliks Kogan, Leonid Tylman, Gregg Rock, Surgicore, LLC, Surgicore Management, Inc., Surgicore Management, LLC, KTHD Investment, LLC, Francisco Payano, Sisa Pakari Cultural Center, Inc.,

Sisa Pakari Centro Cultural & Laboral, Inc., Fanny Guadalupe, Rolando Manzano Moreno, and Cidel del Carmen Tandoza Moreno. Such defendants have not served an answer or motion for summary judgment in this action.

Accordingly, Plaintiffs' notice of partial voluntary dismissal of this action as to these defendants is without prejudice. *See* Fed. R. Civ. P. 41(a)(1)(B).

Dated: August 20, 2024

Respectfully submitted,

**THE WILLIS LAW GROUP, PLLC**

By: /s/ William J. Clay

**WILLIAM J. CLAY** (*admitted pro hac*)

**MICHAEL A. GRAVES**

**AARON E. MEYER**

**KIRK D. WILLIS** (*admitted pro hac*)

1985 Forest Lane

Garland, Texas 75042

Telephone: 214-736-9433

Facsimile: 214-736-9994

Service Email: [service@thewillislawgroup.com](mailto:service@thewillislawgroup.com)

*ATTORNEYS FOR THE PLAINTIFFS*

ROOSEVELT ROAD RE, LTD. AND

TRADESMAN PROGRAM MANAGERS, LLC